

Approved by: _____

HAMZAH KHAN

Special Assistant United States Attorney

Before: THE HONORABLE MARTIN R. GOLDBERG
United States Magistrate Judge
Southern District of New York

- - - - -x
UNITED STATES OF AMERICA

: MISDEMEANOR
COMPLAINT

-v-

: Violation of
38 C.F.R. 1.218(a)(7)

ODELIN SERRANO-VELEZ

: 23 MAG 7563

Defendant

: COUNTY OF OFFENSE:
WESTCHESTER

- - - - -x
SOUTHERN DISTRICT OF NEW YORK, ss:

ANTHONY LUCIANO, being duly sworn, deposes and says that he is a Police Officer, assigned to the Department of Veterans Affairs Police Service, Montrose Veterans Administration Hospital, Montrose, New York, which is located in the Southern District of New York, and charges as follows:

COUNT ONE

On or about October 10, 2023, at the Montrose Veterans Administration Hospital, Montrose, New York, in the Southern District of New York, ODELIN SERRANO-VELEZ, the defendant, unlawfully, knowingly and willfully brought narcotics on Veterans Administration property, to-wit: the defendant admitted to bringing heroine to a patient at the facility.

(38 Code of Federal Regulations, 1.218(a)(7))

The basis for the deponent's knowledge and for the foregoing charges are, in part, as follows:

1. I am a Police Officer, assigned to the Department of Veterans Affairs Police Service, Montrose Veterans

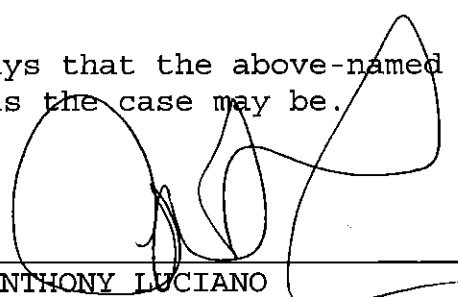
Administration Hospital, Montrose, New York, which is located in the Southern District of New York.

2. Upon information and belief, on or about October 10, 2023, at approximately 11:35 a.m., a rapid response was called to building 28, drug rehabilitation, on VA property. For an overdose. Upon arrival, the patient, Mr. Rodriguez, was administered with two Narcan by the code team. The rapid response turned into a code blue (cardiac arrest) and the Cortlandt paramedic arrived on scene.

3. RN Yvonne Hudson, directed Police Officer Johnathan Rios outside to the person who had been visiting the patient. RN Hudson stated she thought that he had brought something to the patient. PO Rios approached the defendant, nephew of the patient, and asked him if he had brought anything to the patient. The defendant stated, "dope and heroin, he asked me to bring it to him."

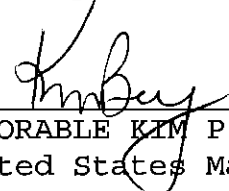
4. PO Rios took the defendant into custody and transported him to the police station for processing. The defendant was brought to the holding cell, he was read a VA Police Pre-Questioning Advice of Constitutional Rights. The defendant initialed and signed the form. The defendant was fingerprinted and photographed and issued a United States District Court Violation Notice for unauthorized introduction on VA property of narcotic drugs and unauthorized giving of same to a patient(DCVN Number 9045127/SY53).

WHEREFORE, deponent prays that the above-named defendant be imprisoned or bailed, as the case may be.



ANTHONY LUCIANO
VA Police Service

Sworn to before me this
15th day of December, 2023



HONORABLE KIM P. BERG
United States Magistrate Judge